

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA :** : **CRIMINAL NO. 07-430**

**v. :** : **DATE FILED: 7/26/07**

**CHRISTOPHER SANDERS :** : **VIOLATIONS:**  
**THEODORE KELLY :** : **18 U.S.C. § 1951(a) (conspiracy to**  
**:** : **interfere with interstate commerce by**  
**:** : **robbery - 1 count)**  
**:** : **18 U.S.C. § 1951(a) (interference with**  
**:** : **interstate commerce by robbery**  
**:** : **- 14 counts)**  
**:** : **18 U.S.C. § 924(c)(1) (using and carrying**  
**:** : **a firearm during a crime of violence**  
**:** : **- 13 counts)**  
**:** : **18 U.S.C. § 2 (aiding and abetting)**

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times relevant to this information:

1. The following businesses located in Philadelphia and Yeadon,

Pennsylvania were engaged in interstate commerce:

- a. 7-Eleven, 1820 Stenton Avenue, Philadelphia, PA;
- b. 7-Eleven, 1337 S. 58<sup>th</sup> Street, Philadelphia, PA;
- c. Taco Bell, 4600 City Line Avenue, Philadelphia, PA;
- d. 7-Eleven, 501 Church Lane, Yeadon, PA;
- e. Dunkin Donuts, 5506 Chestnut Street, Philadelphia, PA;

2. From on or about December 20, 2006 through February 27, 2007, in Philadelphia and Yeadon, in the Eastern District of Pennsylvania, defendants

**CHRISTOPHER SANDERS and  
THEODORE KELLY**

conspired and agreed, together with a person known to the United States Attorney, to commit robbery, which robbery would unlawfully obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, in that defendants SANDERS and KELLY conspired to unlawfully take and obtain money and other items of value from the businesses set forth in paragraph 1 above, in the presence of employees and witnesses of the businesses, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

**MANNER AND MEANS**

It was part of the conspiracy that defendants CHRISTOPHER SANDERS and THEODORE KELLY and a person known to the United States Attorney:

3. Stole over \$4,950 in cash through the commission of five armed robberies of the businesses listed in paragraph 1 above, and by placing patrons and employees of those businesses in fear of physical harm;

4. Traveled together to the business establishments opened for service to the general public in Philadelphia and Yeadon, Pennsylvania;

5. Used a silver revolver in the commission of each robbery;

6. Threatened and intimidated at gunpoint the patrons and employees

working at the businesses to obtain cash and other property; and

7. Received a portion of the stolen money.

### **OVERT ACTS**

In furtherance of the conspiracy and to effect the objects of the conspiracy, defendants CHRISTOPHER SANDERS and THEODORE KELLY and a person known to the United States Attorney, committed the following overt acts, among others, in the Eastern District of Pennsylvania:

#### **THE JANUARY 24, 2007 -7-ELEVEN ARMED ROBBERY**

On or about January 24, 2007, at approximately 12:08 p.m.:

1. Defendants CHRISTOPHER SANDERS and THEODORE KELLY entered the 7-Eleven store located at 1820 Stenton Avenue in Philadelphia.
2. Defendant CHRISTOPHER SANDERS, who was armed with a silver revolver, pulled out the gun, demanded money from the cashier, and stole approximately \$300 in cash, while defendant THEODORE KELLY stood next to a second employee, near the door, and acted as a lookout.
3. After defendant THEODORE KELLY removed the cordless handset of a telephone from the counter of the store and took it with him, he and defendant CHRISTOPHER SANDERS fled from the store.
4. CHRISTOPHER SANDERS and THEODORE KELLY subsequently shared the stolen money they received from the robbery.

#### **THE FEBRUARY 12, 2007 - 7-ELEVEN ARMED ROBBERY**

On or about February 12, 2007, at approximately 8:20 p.m.:

5. Defendant CHRISTOPHER SANDERS, who was armed with a handgun, and defendant THEODORE KELLY entered the 7-Eleven store located at 1337 S. 58<sup>th</sup> Street in Philadelphia.

6. At gunpoint, defendant CHRISTOPHER SANDERS demanded money from an employee of the store, while defendant THEODORE KELLY grabbed a customer in the store and stole money from the customer.

7. After defendants CHRISTOPHER SANDERS and THEODORE KELLY fled the store with approximately \$550 in stolen cash, they subsequently shared the stolen money.

**THE FEBRUARY 15, 2007 TACO BELL ARMED ROBBERY**

On or about February 15, 2007, at approximately 9:30 p.m.:

8. Defendants CHRISTOPHER SANDERS and THEODORE KELLY and a third robber known to the United States Attorney (robber # 1) drove to the area of the Taco Bell located at 4600 City Line Avenue in Philadelphia.

9. Defendants CHRISTOPHER SANDERS and THEODORE KELLY and robber # 1, who was armed with a handgun, entered the store and demanded money from the employees of the Taco Bell.

10. At gunpoint, CHRISTOPHER SANDERS and robber # 1 ordered the manager and other employees to go to the rear of the store; ordered the employees to give them their wallets and cell phones; then ordered the manager to open the safe, and stole approximately \$2,500 in cash. Meanwhile, defendant THEODORE KELLY grabbed an employee in the front of the store and took items from her purse.

11. Defendants CHRISTOPHER SANDERS and THEODORE KELLY

and the robber # 1 fled the store, drove away in the same car they had arrived in, and subsequently shared the stolen cash.

**THE FEBRUARY 16, 2007 - 7-ELEVEN ARMED ROBBERY**

On or about February 16, 2007, at approximately 1:40 a.m.:

12. Defendants CHRISTOPHER SANDERS and THEODORE KELLY were driven to the area of the 7-Eleven located at 501 Church Lane in Yeadon, Pennsylvania, and entered the store.

13. Defendant CHRISTOPHER SANDERS, who was armed with a silver revolver, pulled out the gun and demanded money from the cashier, while defendant THEODORE KELLY remained in the store as a lookout.

14. Defendants CHRISTOPHER SANDERS and THEODORE KELLY removed approximately \$100 in cash, cigarettes, and other items before exiting the store.

**THE FEBRUARY 25, 2007 - DUNKIN DONUTS ARMED ROBBERY**

On February 25, 2007, at approximately 11:15 a.m.:

15. Defendant CHRISTOPHER SANDERS, who was armed with a silver revolver, and defendant THEODORE KELLY entered the Dunkin Donuts, located at 5506 Chestnut Street in Philadelphia.

16. While defendant THEODORE KELLY remained by the front door of the store, defendant CHRISTOPHER SANDERS ordered one of the employees to open the cash register and stole approximately \$2,000 in cash.

17. After defendants CHRISTOPHER SANDERS and THEODORE KELLY fled the store, they subsequently shared the stolen cash.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this information, Dunkin Donuts, 6620 N. Broad Street, Philadelphia, Pennsylvania, was a business engaged in interstate commerce.

2. On or about December 30, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant SANDERS unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from Dunkin Donuts, located at 6620 N. Broad Street in Philadelphia, Pennsylvania, in the presence of an employee of Dunkin Donuts and against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of Dunkin Donuts, by pointing a firearm at, demanding money from, and otherwise threatening her.

In violation of Title 18, United States Code, Sections 1951(a) and 2. \_\_\_\_\_

**COUNT THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about December 30, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this information, 7-Eleven, 7720 Ogontz Avenue, Philadelphia, Pennsylvania, was a business engaged in interstate commerce.
2. On or about January 13, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant SANDERS unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from 7-Eleven, located at 7720 Ogontz Avenue Street in Philadelphia, Pennsylvania, in the presence of an employee of 7-Eleven and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of 7-Eleven, by pointing a BB-gun at, demanding money from, and otherwise threatening him.

In violation of Title 18, United States Code, Sections 1951(a) and 2. \_\_\_\_\_

**COUNT FIVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraph 1.a. of Count One of this information is incorporated here.
2. On or about January 24, 2007, in Philadelphia, in the Eastern District of

Pennsylvania, defendants

**CHRISTOPHER SANDERS and  
THEODORE KELLY**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendants SANDERS and KELLY unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from 7-Eleven, located at 1820 Stenton Avenue, in Philadelphia, Pennsylvania, in the presence of an employee of 7-Eleven and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of 7-Eleven, by pointing a firearm at, demanding money from, and otherwise threatening him.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT SIX**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about January 24, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CHRISTOPHER SANDERS and  
THEODORE KELLY**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT SEVEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this information, Sunoco A-Plus, 5810 N. Broad Street, Philadelphia, Pennsylvania, was a business engaged in interstate commerce.

2. On or about February 9, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant SANDERS unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from Sunoco A-Plus, located at 5810 N. Broad Street, in Philadelphia, Pennsylvania, in the presence of an employee of Sunoco-A-Plus and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of Sunoco A-Plus, by pointing a firearm at, demanding money from, and otherwise threatening him.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT EIGHT**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about February 9, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT NINE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraph 1.b. of Count One of this information is incorporated here.
2. On or about February 12, 2007, in Philadelphia, in the Eastern District of

Pennsylvania, defendants

**CHRISTOPHER SANDERS and  
THEODORE KELLY**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendants SANDERS and KELLY unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from 7-Eleven, located at 1337 S. 58<sup>th</sup> Street, Philadelphia, in the presence of an employee and customer of 7-Eleven and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of 7-Eleven, by pointing a firearm at, demanding money from, and otherwise threatening them.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT TEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about February 12, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CHRISTOPHER SANDERS and  
THEODORE KELLY**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to interfere with commerce by robbery and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT ELEVEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this information, Dunkin Donuts, 1347 W. Olney Avenue, Philadelphia, Pennsylvania, was a business engaged in interstate commerce.

2. On or about February 13, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant SANDERS unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from Dunkin Donuts, located at 1347 W. Olney Avenue, in Philadelphia, Pennsylvania, in the presence of an employee of Dunkin Donuts and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of Dunkin Donuts, by pointing a firearm at, demanding money from, and otherwise threatening him.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT TWELVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about February 13, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT THIRTEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this information, 7-Eleven, 6727 N. 5<sup>th</sup> Street, Philadelphia, Pennsylvania, was a business engaged in interstate commerce.

2. On or about February 14, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant SANDERS unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from 7-Eleven, located at 6727 N. 5<sup>th</sup> Street, in Philadelphia, Pennsylvania, in the presence of an employee of 7-Eleven and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of 7-Eleven, by pointing a firearm at, demanding money from, and otherwise threatening him.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT FOURTEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about February 14, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT FIFTEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraph 1.c. of Count One of this information is incorporated here.
2. On or about February 15, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CHRISTOPHER SANDERS and  
THEODORE KELLY**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendants SANDERS and KELLY unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from Taco Bell, located at 4600 City Line Avenue, Philadelphia, in the presence of employees of Taco Bell and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employees of Taco Bell, by pointing a firearm at, demanding money from, and otherwise threatening them.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT SIXTEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about February 15, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CHRISTOPHER SANDERS and  
THEODORE KELLY**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to interfere with commerce by robbery and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT SEVENTEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraph 1.d. of Count One of this information is incorporated here.
2. On or about February 16, 2007, in Yeadon, in the Eastern District of

Pennsylvania, defendants

**CHRISTOPHER SANDERS and  
THEODORE KELLY**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendants SANDERS and KELLY unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from 7-Eleven, located at 501 Church Lane, Yeadon, in the presence of an employee of 7-Eleven and against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of 7-Eleven, by pointing a firearm at, demanding money from, and otherwise threatening her.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT EIGHTEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about February 16, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CHRISTOPHER SANDERS and  
THEODORE KELLY**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to interfere with commerce by robbery and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT NINETEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this information, Checkers, 5726 Baltimore Avenue, Philadelphia, Pennsylvania, was a business engaged in interstate commerce.

2. On or about February 16, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant SANDERS unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from Checkers, located at 5726 Baltimore Avenue, in Philadelphia, Pennsylvania, in the presence of an employee of Checkers and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of Checkers, by pointing a firearm at, demanding money from, and otherwise threatening him.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT TWENTY**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about February 16, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT TWENTY ONE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this information, Checkers, 4813 Lancaster Avenue, Philadelphia, Pennsylvania, was a business engaged in interstate commerce.

2. On or about February 19, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant SANDERS unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from Checkers, located at 4813 Lancaster Avenue, in Philadelphia, Pennsylvania, in the presence of an employee of Dunkin Donuts and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of Checkers, by pointing a firearm at, demanding money from, and otherwise threatening him.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT TWENTY TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about February 19, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT TWENTY THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraph 1.e. of Count One of this information is incorporated here.
2. On or about February 25, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CHRISTOPHER SANDERS and  
THEODORE KELLY**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendants SANDERS and KELLY unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from Dunkin Donuts, located at 5506 Chestnut Street, Philadelphia, in the presence of employees of Dunkin Donuts and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of Dunkin Donuts, by pointing a firearm at, demanding money from, and otherwise threatening them.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT TWENTY FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about February 25, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CHRISTOPHER SANDERS and  
THEODORE KELLY**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to interfere with commerce by robbery and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT TWENTY FIVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this information, 7-Eleven, 500 E. Baltimore Avenue, Clifton Heights, Philadelphia, Pennsylvania, was a business engaged in interstate commerce.

2. On or about February 27, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant SANDERS unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from 7-Eleven, located at 500 E. Baltimore Avenue, in Clifton Heights, Pennsylvania, in the presence of an employee of 7-Eleven and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of Dunkin Donuts, by pointing a firearm at, demanding money from, and otherwise threatening him.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT TWENTY SIX**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about February 27, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT TWENTY SEVEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this information, 7-Eleven, 731 Main Street, Darby, Pennsylvania, was a business engaged in interstate commerce.

2. On or about February 27, 2007, in Darby, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant SANDERS unlawfully took and obtained, and aided and abetted the taking and obtaining of, cash from 7-Eleven, located at 731 Main Street, in Darby, Pennsylvania, in the presence of an employee of 7-Eleven and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee of 7-Eleven, by pointing a firearm at, demanding money from, and otherwise threatening him.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT TWENTY EIGHT**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about February 27, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER SANDERS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

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**PATRICK L. MEEHAN**  
**UNITED STATES ATTORNEY**